

# BASSI EDLIN HUIE & BLUM

www.behblaw.com

November 25, 2020

**Via U.S. Mail**

National Freedom of Information Act Office  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (2310A)  
Washington, DC 20460

Re: **PUBLIC RECORDS ACT REQUEST**

Dear Sir or Madam:

We hereby request, pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, *et seq.*, that you provide to us copies of, or allow us an opportunity to inspect, the following records:

1) All documents relating to ambient air and/or air emissions monitoring, surveying or sampling and the results of this monitoring, surveying or sampling performed at the St. James Drill Site, at an address commonly known as 814 W. 23rd Street, Los Angeles, CA 90007.

2) All documents consisting of or relating to any communication with the Esperanza Community Housing concerning the real estate located at 814 W. 23rd Street, Los Angeles, CA or the oil and gas operation conducted thereon.

3) All documents relating to any Notices of Violations ("NOVs") or citations issued and/or any resulting regulatory enforcement or legal actions relating to the St. James Drill Site, at an address commonly known as 814 W. 23rd Street, Los Angeles, CA 90007, including any communications with any local, state or federal regulatory agencies issuing any such NOVs or citations and/or pursuing any enforcement actions.

4) All documents, correspondence, or data relating to the field or facility operated by AllenCo Energy, Inc., known as the St. James Drill site, located generally at 814 West 23rd Street, Los Angeles, California, 90007, including, but not limited to, permitting documentation, regulatory or enforcement actions, site investigations and/or cleanup activities, and any other documents, correspondence, or data in your possession related to the St. James Drill site.

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500 Washington Street  
Suite 700  
San Francisco, CA 94111  
2940048

**Tel:** 415-397-9006  
**Fax:** 415-397-1339

515 S. Flower Street  
Suite 1020  
Los Angeles, CA 90071

**Tel:** 213-412-2661  
**Fax:** 213-652-1992

5) All documents, correspondence, or data relating to Timothy James Parker, including, but not limited to, permitting documentation, regulatory or enforcement actions, site investigations and/or cleanup activities, and any other documents, correspondence, or data in your possession related to Timothy James Parker.

6) All documents, correspondence, or data relating to AllenCo Energy, Inc., including, but not limited to, permitting documentation, regulatory or enforcement actions, site investigations and/or cleanup activities, and any other documents, correspondence, or data in your possession related to AllenCo Energy, Inc.

7) All documents, correspondence, or data relating to Clifford E. Peter Allen., including, but not limited to, permitting documentation, regulatory or enforcement actions, site investigations and/or cleanup activities, and any other documents, correspondence, or data in your possession related to Clifford E. Peter Allen.

8) All documents, including notes, emails, correspondence, memoranda, photographs and reports, regarding any communications with the Los Angeles City Attorney's Office regarding the St. James Drill site, located generally at 814 West 23rd Street, Los Angeles, California, 90007.

9) All documents, including notes, emails, correspondence, memoranda, testimonial statements, Powerpoint presentations, photographs and reports, evaluating, assessing and/or attempting to quantify the potential impact or risks to the environment or public health resulting from any activities taking place at the St. James Drill site, located generally at 814 West 23rd Street, Los Angeles, California, 90007, including, but not limited to, air quality, greenhouse gas ("GHG") emissions and climate change and/or human health and safety.

10) All documents, including notes, emails, correspondence, memoranda, Powerpoint presentations, photographs and reports, regarding any complaints regarding any air emissions, odors and/or pollution releases involving the St. James Drill site, located generally at 814 West 23rd Street, Los Angeles, California, 90007, including, but not limited to, those involving the United States Environmental Protection Agency ("USEPA"), the California Geologic Energy Management Division ("Cal/GEM"), the South Coast Air Quality Management District ("SCAQMD") or any other community, public, or private persons or entities.

We respectfully request a response to this Public Records Act request within ten (10) days pursuant to California Government Code Section 6253. Within your response, please indicate whether the public records requested are maintained in an electronic format and if so, which format (for example .pdf, .tif, .jpg, .doc, etc.) To the extent possible, this letter requests that the responsive documents be produced electronically. Accompanying your response, we would appreciate certification that a complete response to our request was provided.

If any public record requested above is not provided and is withheld, please state in writing the specific ground(s) for the withholding. As to each record withheld, if any, please also provide the name and title of the official who made the decision to withhold the record and the name, title, and address of the person or body, if any, to whom the decision to withhold the record may be appealed. In addition,

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please provide information sufficient to identify the record(s), if any, withheld, including the title of the record, the nature of the record (e.g., letter), the number of pages in the record, to whom the record was addressed, shown or circulated, the location of the record, and a statement of the subject matter sufficient to enable us and, if necessary, a court, to evaluate the basis for the decision to withhold the record from the public.

We understand that information requested herein may contain numerous pages and that copying all such information may tax your limited resources. If this is the case, please contact me immediately. If it is more convenient for you, we can arrange to have our service copy the documents at your office.

In order to facilitate the electronic production of any responsive documents, I am prepared to provide you with a link to my law firm's FTP site, where the documents can be immediately uploaded. If more convenient, I can also provide you with a USB flash drive and a stamped return envelope, once the documents are ready for production.

Please direct any questions, comments, and/or your ultimate response to this request to my direct attention via the information provided herein. Thank you in advance your cooperation.

Very truly yours,

BASSI, EDLIN, HUIE & BLUM LLP



NICHOLAS T. MAXWELL

NTM/dc

1 Re: The People of the State of California v. Allenco Energy Inc., et al.  
2 Los Angeles County Court, Case No. 0CJ00630

3 PROOF OF SERVICE – CCP §1013(a)(3)

4 STATE OF CALIFORNIA/COUNTY OF San Francisco

5 I am a citizen of the United States and an employee in the County of San Francisco. I am  
6 over the age of eighteen (18) years and not a party to the within action. My business address is  
7 BASSI, EDLIN, HUIE & BLUM LLP, 500 Washington Street, Suite 700, San Francisco,  
California 94111.

8 On December 8, 2020, I served the within:

9 **PUBLIC RECORDS ACT REQUEST - 814 W. 23rd Street, Los Angeles, CA 90007**

10 on the following parties:

11 National Freedom of Information Act Office  
12 United States Environmental Protection Agency  
13 1200 Pennsylvania Avenue, NW (2310A)  
14 Washington, DC 20460

15  
16 BY PERSONAL SERVICE: I caused a copy of said documents to be hand delivered to  
17 the interested party at the address set forth above.

18 BY ELECTRONIC MAIL: Based upon stipulation and agreement of the parties for  
19 service by electronic transmission, I caused said document(s) to be sent to the persons at  
20 the electronic mail address listed above. I did not receive within a reasonable amount of  
time after the transmission, any electronic message or other indication that the  
transmission was not successful.

21 X BY MAIL: I caused such envelope to be deposited in the mail at Los Angeles,  
22 California. I am readily familiar with the firm's practice for collection and processing of  
23 correspondence for mailing. It is deposited with the U.S. Postal Service on that same day  
24 in the ordinary course of business.

25  
26 I declare under penalty of perjury that the foregoing is true and correct and that this  
27 document is executed on December 8, 2020, at San Francisco, California.  
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*Isra Sebiaa*

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ISRA SEBIAA

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500 Washington Street  
Suite 700  
San Francisco, CA 94111

DEC 16 2020

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